

EXHIBIT A

Leslee Schwartz, Esq. (ID: 092692021)

STEVEN P. HADDAD, P.C.

100 W. Pond Road

Hopelawn, NJ 08861

732-933-3535 Fax: 732-933-3536

Attorney for Plaintiff, Mervat Girgis

<p>MERVAT GIRGIS,</p> <p>Plaintiff</p> <p>Vs.</p> <p>COSTCO WHOLESALE CORP., and/or JOHN DOES 1-10 (being fictitious persons unknown at this time) and/or ABC CO. 1-10 (being fictitious business entities whose identities are unknown at this time), RD MANAGEMENT LLC., and/or JANE DOES 1-10 (being fictitious persons unknown at this time) and/or DEF CO. 1-10 (being fictitious business entities whose identities are unknown at this time),</p> <p>Defendants</p>	<p>SUPERIOR COURT OF NEW JERSEY HUDSON COUNTY - LAW DIVISION DOCKET NUMBER: HUD-L-</p> <p>CIVIL ACTION</p> <p>COMPLAINT AND JURY DEMAND</p>
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Plaintiff, **MERVAT GIRGIS**, residing at 183 Liberty Avenue, in the City of Jersey City, County of Hudson, and State of New Jersey, by way of Complaint says:

FIRST COUNT

1. On or about July 7, 2020, Plaintiff, **MERVAT GIRGIS**, was lawfully on the premises of Costco Wholesale Corporation located at 21 Goldsborough Drive in the City of Bayonne, County of Hudson and State of New Jersey.

2. At the time and place aforesaid, the property was owned by **RD MANAGEMENT LLC., and/or JANE DOES 1-10 (being fictitious persons unknown at this time) and/or DEF CO. 1-10 (being fictitious business entities whose identities are unknown at this time).**

3. At the time and place aforesaid, Defendants, **COSTCO WHOLESALE CORP.**, and/or **JOHN DOES 1-10** (being fictitious persons unknown at this time) and/or **ABC CO. 1-10** (being fictitious business entities whose identities are unknown at this time), managed and maintained said premises owned by Defendant, **RD MANAGEMENT LLC.**, and/or **JANE DOES 1-10** (being fictitious persons unknown at this time) and/or **DEF CO. 1-10** (being fictitious business entities whose identities are unknown at this time).

4. At the time and place aforesaid, Defendants, **COSTCO WHOLESALE CORP.**, and/or **JOHN DOES 1-10** (being fictitious persons unknown at this time) and/or **ABC CO. 1-10** (being fictitious business entities whose identities are unknown at this time), **RD MANAGEMENT LLC.**, and/or **JANE DOES 1-10** (being fictitious persons unknown at this time) and/or **DEF CO. 1-10** (being fictitious business entities whose identities are unknown at this time), owned, operated, maintained and/or controlled the premises in a negligent, careless and reckless manner creating foreseeable and dangerous conditions and activities on the premises, causing Plaintiff, **MERVAT GIRGIS**, to slip, fall and injure herself.

5. At the time and place aforesaid, Defendants, **JOHN DOES 1-10** (being fictitious persons unknown at this time) and/or **ABC CO. 1-10** (being fictitious business entities whose identities are unknown at this time), were acting within the scope of servitude, agency and/or employment for Defendant, **COSTCO WHOLESALE CORP.**

6. At the time and place aforesaid, Defendants, **JANE DOES 1-10** (being fictitious persons unknown at this time) and/or **DEF CO. 1-10** (being fictitious business entities whose identities are unknown at this time), were acting within the scope of servitude, agency and/or employment for Defendant, **RD MANAGEMENT LLC.**

7. As a direct and proximate result of the negligence of Defendants, **COSTCO WHOLESALE CORP.**, and/or **JOHN DOES 1-10** (being fictitious persons unknown at this time) and/or **ABC CO. 1-10** (being fictitious business entities whose identities are unknown at this time), **RD MANAGEMENT LLC.**, and/or **JANE DOES 1-10** (being fictitious persons unknown at this time) and/or **DEF CO. 1-10** (being fictitious business entities whose identities are unknown at this time), Plaintiff, **MERVAT GIRGIS**, was injured, has incurred and in the future will incur expenses for her treatment of injuries, has been disabled and in the future will be disabled and not be able to perform her usual functions, and has been and in the future will be caused great pain and suffering, to her great loss and damage and has lost time from her usual occupation.

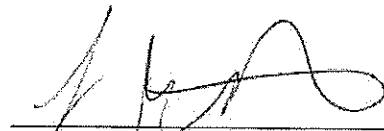
WHEREFORE, Plaintiff, **MERVAT GIRGIS**, demands judgment against Defendants for damages, together with interest, attorney's fees, costs of suit, and any other relief the Court deems just.

CERTIFICATION

I hereby certify that this matter is not subject of any other action pending in any court or arbitration proceeding, that no such other action or arbitration proceeding is contemplated by this plaintiff, and that there are no other parties, whom, to the knowledge of the plaintiffs' counsel, should be joined in this action.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: June 28, 2022



LESLEE SCHWARTZ, ESQ.
For the Law Offices of Steven P. Haddad
Attorney for Plaintiff, Mervat Girgis

DEMAND FOR ANSWERS TO INTERROGATORIES

The Plaintiff demands that each defendant supply answers to Uniform Interrogatories, Form C and C(2), within the time frame allowed by the Rules of Court.

DEMAND FOR ANSWERS TO NOTICE TO PRODUCE DOCUMENTS

The Plaintiff demands that each defendant provide documents pursuant to the following Notice to Produce Documents within the time frame provided by the Rules of Court.

1. Please produce all policies of insurance, including, but not limited to, primary policies, excess policies, umbrella policies, or any other policy that is available for coverage and payment of the Plaintiff's claim.
2. Please produce all statements made by any party to this matter.
3. Please produce all statements made by any witness to the alleged accident.
4. Please produce all background searches, C.I.B. searches, or any other search regarding past personal injury claims, or personal injury lawsuits, of any nature, made by the Plaintiff.
5. Please produce all reports regarding the accident or incident referred to in this Complaint.
6. Please produce any records of any medical treatment for the Plaintiff in this matter.
7. Please produce all photographs, videotapes, and/ or audiotapes obtained regarding the Plaintiff, the Plaintiff's vehicle, or the defendant(s) vehicle in this matter.
8. Please produce all property damage estimates for all vehicles involved in this accident.
9. Please produce any photographs of the accident scene in this matter.

DEMAND FOR DISCOVERY OF INSURANCE COVERAGE

Pursuant to R. 4:10-2, demand is hereby made that you disclose to the undersigned whether there are any insurance policies or agreements under which a person or firm carrying an insurance business may be liable to satisfy all or part of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment. Yes () No ()

If the answer is yes, attach a copy of each policy, or in the alternative, state under oath or certification the following: (a) policy number; (b) name and address of the insurer or issuer; (c) inception and expiration date; (d) names and addresses of all persons insured under the policy; (e) personal injury limits; (f) property damage limits; (g) medical payment limits; (h) name and address of person who has custody and possession thereof; (i) where and when policy can be inspected.

JURY DEMAND

Plaintiff hereby demands a trial by jury as to all issues so triable.

DESIGNATION OF TRIAL COUNSEL

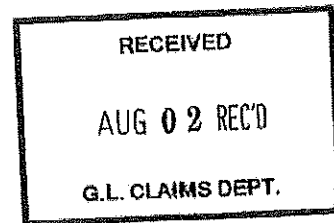
Pursuant to R. 4:5-1(c), Stephen A. Mennella, Esq. is designated as trial counsel.

NOTICE PURSUANT TO R.1:7-1

Pursuant to R.1:7-1(b), Plaintiff hereby gives notice of his/her intention to suggest to the trier of fact that unliquidated damages be calculated on a time-unit basis without reference to a specific sum.

EXHIBIT B

THE HADDAD LAW FIRM, PC
 LESLEE SCHWARTZ, ESQ.
 100 W. Pond Rd,
 Hopelawn, NJ 08861
 (732) 933-3535
 NA



ATTORNEY FOR THE PLAINTIFF

MERVAT GIRGIS

Plaintiff

-v-

COSTCO WHOLESALE CORP., ET AL

Defendant(s)

SUPERIOR COURT OF NEW JERSEY
 LAW DIVISION
 Hudson COUNTY
 DOCKET NO.: HUD-L-002118-22

CIVIL ACTION

SUMMONS

FROM THE STATE OF NEW JERSEY TO: COSTCO WHOLESALE CORP.

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey, and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages, or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

/s/ Michelle M. Smith
 Michelle M. Smith,
 Clerk of the Superior Court

DATED: July 22, 2022

Name of the Defendant(s) to be served: COSTCO WHOLESALE CORP.

Address of the Defendant(s) to be served: 999 LAKE DRIVE, ISSAQUAH, WA 98027

*hand served
 8/11/2022
 Judy Annunzio*

ATLANTIC COUNTY

Law Division, Direct Filing
Atlantic County Court House
1201 Bicharach Blvd. - 1st Floor
Atlantic City, NJ 08401
LAWYER REFERRAL:
609-345-3444
LEGAL SERVICES:
609-348-4200

BERGEN COUNTY

Law Division, Civil Case Processing
119 Justice Center
10 Main Street
Hackensack, NJ 07601-7698
LAWYER REFERRAL:
201-488-0044
LEGAL SERVICES:
201-487-2166

BURLINGTON COUNTY

Superior Court, Law Division
Courts Facility - 1st Floor
Box 6555
Mt. Holly, NJ 08060
LAWYER REFERRAL:
609-261-4862
LEGAL SERVICES:
609-261-1088

CAMDEN COUNTY

Civil Processing Office
Hall of Justices - 1st Floor
501 Fifth Street
Camden, NJ 08103
LAWYER REFERRAL:
856-964-4520
LEGAL SERVICES:
856-964-2010

CAPE MAY COUNTY

Law Division, Direct Filing
Cape May Superior Court
4 Moore Road - DN203
Cape May Court House, NJ 08210
LAWYER REFERRAL:
609-463-0313
LEGAL SERVICES:
609-465-3001

CUMBERLAND COUNTY

Civil Case Management Office
Court House - Room 301
Broad & Fayette Streets
Box 866
Bridgeton, NJ 08302
LAWYER REFERRAL:
856-692-6207
LEGAL SERVICES:
852-451-0003

ESSEX COUNTY

Law Division, Direct Filing
Essex County Hall of Records
Room 237
Newark, NJ 07102
LAWYER REFERRAL:
973-622-6207
LEGAL SERVICES:
973-622-0063

GLOUCESTER COUNTY

Civil Case Management Office
Att: Intake
Court House - 1st Floor
One North Broad Street
Woodbury, NJ 08096
LAWYER REFERRAL:
(856) 848-4589
LEGAL SERVICES:
(856) 848-5360

HUDSON COUNTY

Superior Court Civil Records Dept.
Breanan Court House - 1st Floor
583 Newark Avenue
Jersey City, NJ 07306
LAWYER REFERRAL:
201-798-2727
LEGAL SERVICES:
201-792-6363

HUNTERDON COUNTY

Civil Division Office
Hall of Records
71 Main Street
Flemington, NJ 08822
LAWYER REFERRAL:
908-735-6112
LEGAL SERVICES:
908-782-7979

MERCER COUNTY

Mercer County Office of Deputy
Clerk
P.O. Box 8068
209 So. Broad Street
Trenton, NJ 08650
LAWYER REFERRAL:
609-385-6200
LEGAL SERVICES:
609-695-6249

MIDDLESEX COUNTY

Superior Court - Att: Law Division
Administration Bldg., 3rd Floor
P.O. Box 2633
New Brunswick, NJ 08903-2633
LAWYER REFERRAL:
732-828-0053
LEGAL SERVICES:
732-249-7600

MONMOUTH COUNTY

Law Division, Direct Filing
Court House
71 Monmouth Park - West Wing
P.O. Box 1252
Freehold, NJ 07728-1252
LAWYER REFERRAL:
732-431-5544
LEGAL SERVICES:
732-502-0059

MORRIS COUNTY

Morris County Civil Division
Court House - Box 910
Morristown, NJ 07960
LAWYER REFERRAL:
973-267-5882
LEGAL SERVICES:
973-283-6911

OCEAN COUNTY

Law Division, Direct Filing
Court House - Room 119
118 Washington Street
Toms River, NJ 08754
LAWYER REFERRAL:
732-240-3666
LEGAL SERVICES:
732-341-2727

PASSAIC COUNTY

Passaic County Civil Div. Office
Court House
77 Hamilton Street
Paterson, NJ 07505
LAWYER REFERRAL:
973-278-9223
LEGAL SERVICES:
973-523-2900

SALEM COUNTY

Law Division, Direct Filing
Court House
92 Market Street
P.O. Box 18
Salem, NJ 08079
LAWYER REFERRAL:
856-935-4629
LEGAL SERVICES:
856-451-0003

SOMERSET COUNTY

Civil Division Office
Court House - 3rd Floor
P.O. Box 3000
Somerville, NJ 08876
LAWYER REFERRAL:
908-685-2323
LEGAL SERVICES:
908-231-0840

SUSSEX COUNTY

Sussex County Civil Division
Sussex County Judicial Center
43-47 High Street
Newton, NJ 07860
LAWYER REFERRAL:
973-267-5882
LEGAL SERVICES:
973-383-7400

UNION COUNTY

Deputy Clerk, Superior Court
Court House - Room 107
2 Broad Street
Elizabeth, NJ 07207-6703
LAWYER REFERRAL:
908-353-4715
LEGAL SERVICES:
908-354-4340

WARREN COUNTY

Warren County Civil Div. Office
Court House
413 Second Street
Belvidere, NJ 07823-1500
LAWYER REFERRAL:
908-267-5882
LEGAL SERVICES:
908-475-2010

Leslee Schwartz, Esq. (ID: 092692021)

The Haddad Law Firm, P.C.

100 W. Pond Road

Hopelawn, NJ 08861

732-933-3535 Fax: 732-933-3536

Attorney for Plaintiff, Mervat Girgis

MERVAT GIRGIS,

Plaintiff

Vs.

**COSTCO WHOLESALE CORP.,
JOHN/JANE DOE, MANAGER OF
COSTCO ON 7/7/2020, and/or JOHN DOES
1-10 (being fictitious persons unknown at this
time) and/or ABC CO. 1-10 (being fictitious
business entities whose identities are unknown
at this time), RD MANAGEMENT LLC.,
and/or JANE DOES 1-10 (being fictitious
persons unknown at this time) and/or DEF
CO. 1-10 (being fictitious business entities
whose identities are unknown at this time),**

Defendants

**SUPERIOR COURT OF NEW JERSEY
HUDSON COUNTY - LAW DIVISION
DOCKET NUMBER: HUD-L-002118-22**

CIVIL ACTION

**FIRST AMENDED
COMPLAINT AND JURY DEMAND**

Plaintiff, **MERVAT GIRGIS**, residing at 183 Liberty Avenue, in the City of Jersey City, County of Hudson, and State of New Jersey, by way of Complaint says:

FIRST COUNT

1. On or about July 7, 2020, Plaintiff, **MERVAT GIRGIS**, was lawfully on the premises of Costco Wholesale Corporation located at 21 Goldsborough Drive in the City of Bayonne, County of Hudson and State of New Jersey.

2. At the time and place aforesaid, the property was owned by **RD MANAGEMENT LLC.**, and/or **JANE DOES 1-10** (being fictitious persons unknown at this time) and/or **DEF CO. 1-10** (being fictitious business entities whose identities are unknown at this time).

3. At the time and place aforesaid, the manager of the day was Defendant, **JOHN/JANE DOE, MANAGER OF COSTCO ON 7/7/2020.**

4. At the time and place aforesaid, Defendants, **COSTCO WHOLESALE CORP.**, and/or **JOHN DOES 1-10** (being fictitious persons unknown at this time) and/or **ABC CO. 1-10** (being fictitious business entities whose identities are unknown at this time), managed and maintained said premises owned by Defendant, **RD MANAGEMENT LLC.**, and/or **JANE DOES 1-10** (being fictitious persons unknown at this time) and/or **DEF CO. 1-10** (being fictitious business entities whose identities are unknown at this time).

4. At the time and place aforesaid, Defendants, **COSTCO WHOLESALE CORP.**, and/or **JOHN DOES 1-10** (being fictitious persons unknown at this time) and/or **ABC CO. 1-10** (being fictitious business entities whose identities are unknown at this time), **RD MANAGEMENT LLC.**, and/or **JANE DOES 1-10** (being fictitious persons unknown at this time) and/or **DEF CO. 1-10** (being fictitious business entities whose identities are unknown at this time), owned, operated, maintained and/or controlled the premises in a negligent, careless and reckless manner creating foreseeable and dangerous conditions and activities on the premises, causing Plaintiff, **MERVAT GIRGIS**, to slip, fall and injure herself.

5. At the time and place aforesaid, Defendants, **JOHN DOES 1-10** (being fictitious persons unknown at this time) and/or **ABC CO. 1-10** (being fictitious business entities whose identities are unknown at this time), were acting within the scope of servitude, agency and/or employment for Defendant, **COSTCO WHOLESALE CORP.**

6. At the time and place aforesaid, Defendants, **JANE DOES 1-10** (being fictitious persons unknown at this time) and/or **DEF CO. 1-10** (being fictitious business entities whose identities are unknown at this time), were acting within the scope of servitude, agency and/or employment for Defendant, **RD MANAGEMENT LLC.**

7. As a direct and proximate result of the negligence of Defendants, **COSTCO WHOLESALE CORP.**, and/or **JOHN DOES 1-10** (being fictitious persons unknown at this time) and/or **ABC CO. 1-10** (being fictitious business entities whose identities are unknown at this time), **RD MANAGEMENT LLC.**, and/or **JANE DOES 1-10** (being fictitious persons unknown at this time) and/or **DEF CO. 1-10** (being fictitious business entities whose identities are unknown at this time) and **JOHN/JANE DOE, MANAGER OF COSTCO ON 7/7/2020**, Plaintiff, **MERVAT GIRGIS**, was injured, has incurred and in the future will incur expenses for her treatment of injuries, has been disabled and in the future will be disabled and not be able to perform her usual functions, and has been and in the future will be caused great pain and suffering, to her great loss and damage and has lost time from her usual occupation.

WHEREFORE, Plaintiff, **MERVAT GIRGIS**, demands judgment against Defendants for damages, together with interest, attorney's fees, costs of suit, and any other relief the Court deems just.

DEMAND FOR ANSWERS TO INTERROGATORIES

The Plaintiff demands that each defendant supply answers to Uniform Interrogatories, Form C and C(2), within the time frame allowed by the Rules of Court.

DEMAND FOR ANSWERS TO NOTICE TO PRODUCE DOCUMENTS

The Plaintiff demands that each defendant provide documents pursuant to the following Notice to Produce Documents within the time frame provided by the Rules of Court.

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3. Please produce all statements made by any witness to the alleged accident.
4. Please produce all background searches, C.I.B. searches, or any other search regarding past personal injury claims, or personal injury lawsuits, of any nature, made by the Plaintiff.

5. Please produce all reports regarding the accident or incident referred to in this Complaint.
6. Please produce any records of any medical treatment for the Plaintiff in this matter.
7. Please produce all photographs, videotapes, and/ or audiotapes obtained regarding the Plaintiff, the Plaintiff's vehicle, or the defendant(s) vehicle in this matter.
8. Please produce all property damage estimates for all vehicles involved in this accident.
9. Please produce any photographs of the accident scene in this matter.

DEMAND FOR DISCOVERY OF INSURANCE COVERAGE

Pursuant to R. 4:10-2, demand is hereby made that you disclose to the undersigned whether there are any insurance policies or agreements under which a person or firm carrying an insurance business may be liable to satisfy all or part of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment. Yes () No ()

If the answer is yes, attach a copy of each policy, or in the alternative, state under oath or certification the following: (a) policy number; (b) name and address of the insurer or issuer; (c) inception and expiration date; (d) names and addresses of all persons insured under the policy; (e) personal injury limits; (f) property damage limits; (g) medical payment limits; (h) name and address of person who has custody and possession thereof; (i) where and when policy can be inspected.

JURY DEMAND

Plaintiff hereby demands a trial by jury as to all issues so triable.

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:5-1(c), Stephen P. Haddad, Esq. is designated as trial counsel.

NOTICE PURSUANT TO R.1:7-1

Pursuant to R.1:7-1(b), Plaintiff hereby gives notice of his/her intention to suggest to the trier of fact that unliquidated damages be calculated on a time-unit basis without reference to a specific sum.

CERTIFICATION

I hereby certify that this matter is not subject of any other action pending in any court or arbitration proceeding, that no such other action or arbitration proceeding is contemplated by this plaintiff, and that there are no other parties, whom, to the knowledge of the plaintiffs' counsel, should be joined in this action.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: July 14, 2022

Leslee Schwartz
LESLEE SCHWARTZ, ESQ.
The Haddad Law Firm, P.C.
Attorney for Plaintiff, Mervat Girgis

EXHIBIT C



[HOME](#) [ABOUT ▼](#) [PROPERTIES ▼](#) [TENANTS](#) [SERVICES ▼](#) [CONTACT](#) [PROPERTY SEARCH](#)

CONTACT

Corporate Headquarters:

RD Management LLC
810 Seventh Avenue
10th Floor
New York, NY 10019
Tel: 212.265.6600
Fax: 212.459.9133
Email: info@rdmanagement.com



We look forward to
hearing from you.

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[SITE MAP](#) [SIGN UP](#)